



REQUEST FOR PROPOSALS (RFP)

Consulting Services – Analysis of Impediments to Fair Housing

**CITY OF CHARLOTTE
HOUSING & NEIGHBORHOOD SERVICES DEPARTMENT - HOUSING SERVICES**

**DATE ISSUED:
April 2, 2019**

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1 REQUEST FOR PROPOSALS (RFP) INSTRUCTIONS

1.1 Public Notice

The City of Charlotte (City) plans to select a consultant to provide consulting services for an Analysis of Impediments to Fair Housing. The City is seeking an agency whose combination of experience and expertise will provide timely, cost-effective service to the City.

Information related to this solicitation, including any addenda, will be posted to the City's Housing Website at:

<http://charlottenc.gov/HNS/Housing/RFP/Pages/Requests%20For%20Proposals.aspx>

For questions related to this RFP, contact:

Warren Wooten
Housing Operations Manager
City of Charlotte
Housing & Neighborhood Services
600 East Trade Street
Direct Phone: (704) 336-2489
Email: twooten@charlottenc.gov

1.2 Project Overview

The U.S. Department of Housing and Urban Development (HUD)'s Fair Housing rule aims to provide all HUD grantees with clear guidelines and data that will help set goals to reduce barriers to fair housing. As of January 2018, HUD rescinded its mandate that all Participating Jurisdictions (PJ) receiving federal funds prepare an Assessment of Fair Housing (AFH). HUD has thus reverted to the requirement of the Analysis of Impediments (AI) to address fair housing barriers and goals for all PJs.

The purpose of the AI is to serve as the basis of Fair Housing Planning and provide essential and detailed information to policymakers, administrative staff, housing providers, lenders, citizens and fair housing advocates. This approach provides a mechanism for HUD grantees to build fair housing goals into their existing community development and housing planning processes. The AI involves a review of fair housing laws and its effects upon a specific locality. An AI should take into account the availability and accessibility of housing and housing services, concentrated areas of poverty, and commercial and retail development. Based upon a review of these and other factors, an assessment is made of both the public and private sectors that affect fair housing choice.

Scope of Work is further detailed in Exhibit A – Scope of Work.

1.3 RFP schedule and Proposal Submission

Provided below is the anticipated schedule of events. The City reserves the right to adjust the schedule and to add/remove specific events to meet the unique needs of this Project.

Advertisement of RFP:	April 2, 2019
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Deadline for Questions:	April 12, 2019
DUE DATE & TIME FOR PROPOSALS:	April 29, 2019 by 4pm

Proposals shall be enclosed in a sealed envelope or package, addressed to the City of Charlotte. The name and address of the prospective agency and RFP Title shall be placed on the outside of the package. All items required for a responsive proposal shall be included. It is the sole responsibility of the proposer to ensure that the proposal package is received no later than the established due date and time at the proper location. Proposals received after the due date and time will not be considered. Proposals submitted by facsimile or other electronic means will not be accepted.

Submit/Deliver to: **Warren Wooten**
Housing Operations Manager
City of Charlotte
Housing & Neighborhood Services
600 East Trade Street
Charlotte, North Carolina 28202

1.4 Evaluation Criteria & Process

The City will review and rate each proposal based on the following criteria;

- General agency experience with Analysis of Impediments
- Agency availability to complete work in a timely manner
- Proposed approach
- Proposed cost effectiveness

The City reserves the sole right to select the most qualified agency on the basis of best overall value that is most advantageous to the City.

Agencies who submit proposals will be notified of the selection results. Final recommendation of any selected agency is subject to the approval of City Council or City officials.

1.5 Proposal Format & Contents

Interested agencies must complete and submit two (2) original copies of their proposal document and each of the required Forms 1 thru 5 provided with this RFP.

Proposals must include:

1. All required forms outlined in this RFP.
2. The Consultant's name, mailing address, email address, and telephone numbers.
3. A list of all of the persons (including the principal and any employees or subcontractors) to be involved in carrying out the proposed work, describing each person's qualifications and proposed involvement in specific tasks. Attach a resume for each person.
4. The proposed approach and proposed approach schedule.

5. The proposed contract amount and a proposed payment schedule. You are encouraged to show detailed work hours and pricing related to the scope of work.
6. A list of all other work and projects to which the Consultant anticipates to be committed during the period of performance, including the estimated period of time of the work and an estimate of the projected percentage of full-time equivalency in work hours required for such other work.
7. A listing of any other planned travel or existing commitments.
8. A list and description of similar work completed in the last two (2) years. Describe any proposals written and/or experience in initiatives involving multiple entities and collaborative approaches.
9. Contact information for references from at least two organizations for which work similar to that proposed has been done. Include the reference's name, organization, telephone number and email address. For each reference, please describe how the work compares to that proposed.
10. A copy of a grant application, study or other document which illustrates research and writing style and ability.
11. Any additional information or materials relevant to the Consultant's availability, qualifications and capacity to do the work.
12. A statement authorizing the City to verify references.

1.6 Preferred Qualifications

1. Familiarity and prior experience with the Housing and Urban Development's (HUD) Fair Housing Program, Analysis of Impediments and HUD's Affirmatively Furthering Fair Housing Rule, AFFH Rulebook and Requirements.
2. Familiarity with Gastonia, Gaston County, and its fair housing issues and components.
3. Knowledge and experience with both HUD's five-year Consolidated Plan and the Annual Action Plan and its processes.
4. Experience with HUD-Provided Data, Analyzing Fair Housing Data and HUD-provided maps and tables.
5. Availability and commitment to attend all required meetings and meet all deadlines.
6. Demonstrated writing ability.
7. Demonstration of research and analysis skills, including quantitative analysis.
8. Ability to start work immediately upon execution of a professional services contract with the City.
9. Proficiency in technical reporting.
10. Working knowledge of information systems, both specific and broad-based.
11. Excellent interpersonal and facilitation skills.

END OF SECTION ONE

2 REPRESENTATIONS, CONDITIONS, AND OTHER REQUIREMENTS

2.1 Communications

All communication of any nature with respect to this RFP shall be addressed to the Contracts Administrator identified in this RFP. With the exception of communications with the Contracts Administrator and Charlottes Business INclusion Officer for this RFP, prospective agencies and their staffs are prohibited from communicating with elected City officials, City staff and any selection committee member regarding this RFP or submittals from the time the RFP was released until the selection results are publicly announced. Violation of this provision may lead to disqualification of the agency's proposal for consideration.

2.2 Duties and Obligations of Agencies in the RFP Process

Interested agencies are expected to fully inform themselves as to all conditions, requirements and specifications of this RFP before submitting a proposal. Agencies must perform its own evaluation and due diligence verification of all information and data provided by the City. The City makes no representations or warranties regarding any information or data provided by the City. Agencies are expected to promptly notify the City in writing to report any ambiguity, inconsistency or error in this RFP. Failure to notify the City accordingly will constitute a waiver of claim of ambiguity, inconsistency or error.

2.3 No Collusion, Bribery, Lobbying or Conflict of Interest

By responding to this RFP, the agency shall be deemed to have represented and warranted that the proposal is not made in connection with any competing agency submitting a separate response to this RFP, and is in all respects fair and without collusion or fraud. Furthermore, the agency certifies that neither it, any of its affiliates or subcontractors, nor any employees of any of the foregoing has bribed or lobbied, or attempted to bribe or lobby, an officer or employee of the City in connection with this RFP.

2.4 Public Records

Upon receipt by the City, each proposal becomes the property of the City and is considered a public record except for material that qualifies as "trade secret" North Carolina General Statute 66-152 et seq. Proposals will be reviewed by the City's evaluation committee, as well as other City staff. To properly designate material as a trade secret under these circumstances, each agency must take the following precautions: (a) any trade secrets submitted by the agency should be submitted in a separate, sealed envelope marked "Trade Secret – Confidential and Proprietary Information – Do Not Disclose Except for the Purpose of Evaluating this Proposal," and (b) the same trade secret/confidentiality designation should be stamped on each page of the trade secret materials contained in the envelope.

In submitting a proposal, each agency agrees that the City may reveal any trade secret materials contained in such response to all City staff and City officials involved in the evaluation process and to any outside consultant or other third parties who serve on the evaluation committee or who are hired by the City to assist in the evaluation process. Furthermore, each agency agrees to indemnify and hold harmless the City and each of its officers, employees and agents from all costs, damages and expenses incurred in connection with refusing to disclose any material that the agency has designated as a trade secret. Any agency that designates its entire proposal as a trade secret may be disqualified from consideration.

2.5 Advertising

In submitting an RFP, proposer agrees not to use the results therefrom as part of any commercial advertising without prior written approval of the City of Charlotte.

2.6 Vendor Registration with City of Charlotte and NC Secretary of State

The selected agency and subcontractors must be registered in the City's Vendor Registration System in order to receive payment for services and/or supplies provided under any City contract.

Any agency wishing to be considered for the Services must be properly registered with the Office of the Secretary of State at the time of submission. The agency selected under this RFP will be responsible for providing all professional, technical, managerial, and administrative staff with the appropriate skills and qualifications to perform the required services.

2.7 Financial Capacity; Insurance Requirements

The selected agency must have the financial capacity to undertake the work and assume associated liability. The selected agency will be required to provide certificates of insurance evidencing coverage for automobile liability in the minimum amount of \$1,000,000; commercial general liability in the minimum amount of \$1,000,000; a fidelity bond of \$50,000; and workers' compensation insurance as required by North Carolina statutes.

2.8 Ownership of Work Products

The City shall have exclusive ownership of all intellectual property rights in all documents and other work product prepared by, for, or under the direction of the selected agency pursuant to any contract under this RFP (collectively, the "Intellectual Property"), including without limitation the right to copy, use, disclose, distribute, and make derivations of the Intellectual Property for any purpose or to assign such rights to any third party. The Intellectual Property shall be prepared in the City's name and shall be the sole and exclusive property of the City, whether or not the work contemplated therein is performed. The City will grant the agency a royalty-free, non-exclusive license to use and copy the Intellectual Property to the extent necessary to perform the contract.

2.9 City Rights and Reservations

The City expects to select one or more agencies, but reserves the right to request substitutions of any key team member, including staff and subcontractors. The City reserves the right to contact any agency/team for any additional information including but not limited to experience, qualifications, abilities, equipment, facilities, and financial standing. The City reserves the right to modify any part of this RFP as issued with an addendum. The City, at its sole discretion, reserves the right to reject any or all responses to the RFP, to cancel the RFP, to re-advertise for new RFP responses either with identical or revised specifications, or to accept any RFP response, in whole or part, deemed to be in the best interest of the City. The City reserves the right to waive technicalities and informalities.

A response to this RFP shall not be construed as a contract, nor indicate a commitment of any kind.

The City of Charlotte reserves the sole right to award a contract or contracts to the most qualified agency(s) on the basis of best overall proposal most advantageous to the City. The City of Charlotte is therefore not bound to accept a proposal on the basis of lowest price. The City of

Charlotte also reserves the right to make multiple awards, based on experience and qualifications if it is deemed in the City's best interest.

2.10 Contract

The contents of this RFP and all provisions of the successful proposal deemed responsive by the City of Charlotte may be incorporated, either in whole or in part, into a contract and become legally binding when approved and executed by both parties. Contents of the contract may contain changes from the City of Charlotte's perspective as a result of the RFP process and proposal(s) received. The final negotiated contract may include the scope of work as outlined in this RFP along with the successful agency's submittal and any additions or deletions made at the discretion of the City as a result of the RFP process.

2.11 Addenda / Questions and Answers

Agencies may submit written questions concerning this RFQ Warren Wooten via email at twooten@charlottenc.gov. Questions received after the stated deadline in the Schedule of Events will not be answered. No oral statement of any person shall modify or otherwise change or affect the terms, conditions, or specifications stated in the RFQ, and changes to the RFQ, if any, shall be made in writing only and issued in the form of an Addendum to the RFQ. Addenda and clarifications will be posted on Housing Services website at <https://charlottenc.gov/HNS/Housing/RFP/Pages/Requests%20For%20Proposals.aspx>

2.12 Charlotte Business INclusion

Pursuant to Charlotte City Council's adoption of the Charlotte Business INclusion (CBI) Policy, the Charlotte Business INclusion program promotes diversity, inclusion, and local business opportunities in the City's contracting and procurement process for Minority, Women, and Small Business Enterprises (MWSBEs) headquartered in the Charlotte Combined Statistical Area (CSA). The CBI Policy is posted at: www.charlottebusinessinclusion.com.

The City of Charlotte is committed to promoting opportunities for maximum participation of certified MWSBEs on City funded contracts at both the Prime and Subcontract level. In regards to this effort, SBE participation will be required in order to meet goal compliance. For SBE participation to count towards a Goal, SBEs must meet both the certification and geographic requirements as detailed throughout this solicitation and in the CBI Policy.

The **Charlotte CSA** refers to the Charlotte-Gastonia-Salisbury Combined Statistical Area in effect as of April 8, 2013 consisting of; (a) the North Carolina counties of Anson, Cabarrus, Cleveland, Gaston, Iredell, Lincoln, Mecklenburg, Rowan, Stanly, and Union; and (b) the South Carolina counties of Chester, Lancaster, and York. This is one criteria used by Charlotte Business INclusion to determine eligibility to participate in the program.

Agencies are highly encouraged to consider any and all possibilities for MWSBE participation. A complete list of City certified SBEs is available at www.charlottebusinessinclusion.com.

2.13 Special Provisions

Community Development Block Grant may fund all or part of the contract resulting from this RFP. The selected agency shall comply with the following provisions.

2.13.1 Debarment and Suspension. The Consultant represents and warrants that, as of the Effective Date of the Contract, consultant or subconsultant(s) performing work under this Contract (at any tier) is included on the federally debarred bidder's list listed on the government wide exclusions in the System for Award Management (SAM), in accordance with the OMB guidelines at 2 CFR 180 that implement Executive Orders 12549 (3 CFR part 1986 Comp., p. 189) and 12689 (3 CFR part 1989 Comp., p. 235), "Debarment and Suspension." If at any point during the Contract term the consultant or subconsultant(s) performing work at any tier is included on the federally debarred bidder's list, the Sub-recipient shall notify the City immediately. The consultant completed Attachment 3– Vendor Debarment Certification.

2.13.2 Record Retention. The Consultant certifies that it will comply with the record retention requirements detailed in 2 CFR § 200.333. The Consultant further certifies that it will retain all records as required by 2 CFR § 200.333 for a period of three (3) years after it receives City notice that the City has submitted final expenditure reports or quarterly or annual financial reports, as applicable, and all other pending matters are closed.

2.13.3 Byrd Anti-Lobbying Amendment (31 U.S.C. 1352). The Consultant certifies that: No federal appropriated funds have been paid or will be paid, by or on behalf of the Consultant, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal Loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of and Federal contract, grant, loan, or cooperative agreement.

If any funds other than federal appropriated funds have been paid or will be paid to any person for making lobbying contacts to an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this federal contract, grant, loan, or cooperative agreement, the Sub-recipient shall complete and submit Standard Form—LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions [as amended by "Government wide Guidance for New Restrictions on Lobbying," 61 Fed. Reg. 1413 (1/19/96)].

The Consultant shall require that the language of this certification be included in the award documents for all subawards at all tiers (including consultant, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

2.13.4 Right to Inventions. If the federal award is a "funding agreement" under 37 CFR 401.2 and the City wishes to enter into a contract with a small business firm or nonprofit organization regarding the substitution of parties, assignment of performance or experimental, developmental or research work thereunder, the City must comply with 37 CFR Part 401, "Rights to Inventions Made by Nonprofit Organizations and Small Business Firms Under Government Grants, Contracts and Cooperative Agreements," and any implementing regulations issued by the awarding agency.

2.13.5 DHS Seal, Logo, and Flags. The Sub-recipient shall not use the Department of Homeland Security ("DHS") seal(s), logos, crests, or reproductions of flags or likenesses of DHS agency officials without specific FEMA pre-approval.

2.13.6 The Federal Government is not a party to this contract and is not subject to any obligations or liabilities to the City, sub-recipient, or any other party pertaining to any matter resulting from the contract.

END OF SECTION TWO

Form 1 – Execution of Proposal

The person executing the Proposal, on behalf of the Company, being duly sworn, solemnly swears (or affirms) that neither he, nor any official, agent or employee of the Company has entered into any agreement, participated in any collusion, or otherwise taken any action which is in restraint of full and open competition in connection with any proposal or contract, that the Company has not been convicted of violating North Carolina General Statute 133-24 within the last three years, and that the Company intends to do the work with its own bona fide employees or subcontractors and is not proposing for the benefit of another company.

Submission of a response to this RFP constitutes certification that the Company and all proposed team members are not currently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in this Project by any State or Federal department or agency. Submission is also agreement that the City will be notified of any change in this status.

NC General Statute 133-32 and City Policy prohibit any gift from anyone with a contract with the City, or from any person seeking to do business with the City. By execution of this Proposal, you attest, for your organization and its employees or agents, that you are not aware that any such gift has been offered, accepted, or promised by any employees of your organization.

The information contained in this Proposal, including its forms and other documents, delivered or to be delivered to the City, is true, accurate, and complete. This Proposal includes all information necessary to ensure that the statements therein do not in whole or in part mislead the City as to any material facts.

**Type of Company:
(check 1 box)**

☐ Sole Proprietor ☐ Partnership ☐ Joint Venture

☐ Corporation _____ (identify the State of incorporation)

(if joint venture, complete this "Proposal Submission" sheet for each joint venture company and identify the "Name of Joint Venture" on each sheet)

NAME OF JOINT VENTURE: _____

City of Charlotte Vendor Number: _____

ACKNOWLEDGEMENT OF ADDENDA:

The undersigned acknowledges receipt of the following addenda:

No: _____ Date: _____ No: _____ Date: _____ No: _____ Date: _____

Company Legal Name: _____

Mailing Address: _____

City/State/Zip: _____

Phone: _____ Email: _____

Signature of Authorized Representative (or Designee)

(Print Name)

(Title)

Date

Proposal is valid for one-hundred-eighty (180) days from the Proposal due date.

FORM 2 – COMMERCIAL NON-DISCRIMINATION CERTIFICATION

COMPANY NAME: _____

RFP NAME: FY19 – Consulting – Analysis of Impediments

The undersigned Company hereby certifies and agrees that the following information is correct:

1. In preparing its bid/proposal, the Company has considered all bids/proposals submitted from qualified, potential subcontractors and suppliers and has not engaged in discrimination as defined in Section 2 below.
2. For purposes of this section, *discrimination* means discrimination in the solicitation, selection, or treatment of any subcontractor, vendor, supplier or commercial customer on the basis of race, ethnicity, gender, age, religion, national origin, disability or other unlawful form of discrimination. Without limiting the foregoing, *discrimination* also includes retaliating against any person or other entity for reporting any incident of discrimination.
3. Without limiting any other remedies that the City may have for a false certification, it is understood and agreed that, if this certification is false, such false certification will constitute grounds for the City to reject the bid/proposal submitted with this certification and terminate any contract awarded based on such bid/proposal. It shall also constitute a violation of the City's Commercial Non-Discrimination Ordinance and shall subject the Company to any remedies allowed thereunder, including possible disqualification from participating in City contracts for up to two years.
4. As a condition of contracting with the City, the Company agrees to promptly provide to the City all information and documentation that may be requested by the City from time to time regarding the solicitation and selection of subcontractors and suppliers. Failure to maintain or failure to provide such information shall constitute grounds for the City to reject the bid/proposal and to terminate any contract awarded on such bid/proposal. It shall also constitute a violation of the City's Commercial Non-Discrimination Ordinance and shall subject the Company to any remedies that are allowed thereunder.
5. As part of its bid/proposal, the Company shall provide to the City a list of all instances within the past ten years where a complaint was filed or pending against the Company in a legal or administrative proceeding alleging that the Company discriminated against its subcontractor, vendors, suppliers, or commercial customers, and a description of the status or resolution of that complaint, including any remedial action taken.
6. As a condition of submitting a bid/proposal to the City, the Company agrees to comply with the City's Commercial Non-Discrimination Policy as described in Section 2, Article V of the Charlotte City Code, and consents to be bound by the award of any arbitration conducted thereunder.

Signature of Authorized Representative (or Designee)

(Print Name)

(Title)

(Date)

Form 3 - E-VERIFY CERTIFICATION

COMPANY NAME: _____

RFP NAME: FY19 – Consulting – Analysis of Impediments

This E-Verify Certification is provided to the City of Charlotte (the “City”) by the company signing below (“Company”) as a prerequisite to the City considering Company for award of a City contract (the “Contract”).

1. Company understands that: a. E-Verify is the federal program operated by the United States Department of Homeland Security and other federal agencies to enable employers to verify the work authorization of newly hired employees pursuant to federal law, as modified from time to time.

b. Article 2 of Chapter 64 of the North Carolina General Statutes requires employers that transact business in this state and employ 25 or more employees in this state to: (i) verify the work authorization of newly hired employees who will be performing work in North Carolina through E-Verify; and (ii) maintain records of such verification (the “E-Verify Requirements”). Section 126-7.1 of the North Carolina General Statutes requires state agencies to verify their employees’ work statuses through E-Verify.

c. North Carolina General Statute 160A-20.1(b) prohibits the City from entering into contracts unless the contractor and all subcontractors comply with the E-Verify Requirements.

2. As a condition of being considered for the Contract, Company certifies that: a. If Company has 25 or more employees working in North Carolina (whether now or at any time during the term of the Contract), Company has complied and will comply with the E-Verify Requirements with respect to Company employees working in North Carolina; and

b. Regardless of how many employees Company has working in North Carolina; Company will take appropriate steps to ensure that each subcontractor performing work on the Contract that has 25 or more employees working in North Carolina complies with the E-Verify Requirements.

3. Company acknowledges that the City will be relying on this Certification in entering into the Contract, and that the City may incur expenses and damages if the City enters into the Contract with Company and Company or any subcontractor fails to comply with the E-Verify Requirements. Only in the manner and to the extent permitted by the North Carolina Tort Claims Act, N.C.G.S. §143-291, et seq., and without waiver of its sovereign immunity, company agrees to indemnify and save the City harmless from and against all losses, damages, costs, expenses obligations, duties, fines and penalties (collectively “Losses”) arising directly or indirectly from violation of the E-Verify Requirements by Company or any of its subcontractors, including without limitation any Losses incurred as a result of the Contract being deemed void.

Signature of Authorized Representative (or Designee)

(Print Name)

(Title)

(Date)

FORM 4 – Staffing

COMPANY NAME: _____

RFP NAME: FY19 Consultant Services – Analysis of Impediments

List the full names of all **employees** whom you intend to assign to this program. Describe their specific role/responsibility and availability. Add additional pages as necessary.

Employee Name & Title	Project Role	Availability	Education / Experience
John Smith, Counselor	Program eligibility client services & counseling	Full time staff assigned 50% to this program	MSW

Form 5 - Exhibit A: Scope of Work

The scope of work shall include at a minimum, the following:

1. Evaluation of Charlotte Mecklenburg's current Analysis of Impediments, fair housing components specific to the program area, current fair housing practices, and HUD requirements.
2. While the current requirement is to submit an Analysis of Impediments, the City's objective is the incorporate HUD's Affirmatively Furthering Fair Housing (AFFH) rule, AI User Interface Tool, and the AFFH Data and Mapping Tool where possible. The AI is to be a hybrid of the current AI and forthcoming AFH processes.
3. Design a community participation process to be facilitated by City Staff, to include - meeting with, providing and obtaining information from city committees, focus groups, community groups, citizens, and public and private agencies that provides fair housing insight; incorporate information in the development of a plan consistent with HUD's requirements.
4. Research, assess and identify fair housing contributing factors. Identify and prioritize contributing factors that limit or deny fair housing choice or access to opportunity
5. Establish, prioritize and set Fair housing priorities and goals – identify multiple goals to overcome fair housing issues and significant contributing factors that impedes or limits fair housing or fair housing choice.
6. Prepare AI Draft and ensure the content is consistent with the standards established for the Analysis of Impediments and the AFFH Rule Guidebook; provide technical assistance, development, oversight and implementation of an analysis of Impediments (AI), incorporating components of the Affirmatively Furthering Fair Housing rule where possible; provide recommendations to City staff on the overall activities, structure and management of the draft plan.
7. Prepare materials and presentations of the Draft AI Plan; submit the initial preliminary draft to the collaborating parties for review and comments; allow for a thirty (30) day public comment period; respond to public comments; revise the plan accordingly and resubmit to City staff/collaborating parties.

Deliverable – a final Analysis of Impediments to Fair Housing document for the City of Charlotte and Mecklenburg County that complies with all HUD regulations regarding this activity.